

SHER TREMONTE LLP

March 14, 2025

**BY ECF**

The Honorable Ronnie Abrams  
United States District Judge  
40 Foley Square  
New York, NY 10007

**Re: *Doe v. Combs, et. al.*, Case No. 24-cv-07973 (RA)**

Dear Judge Abrams:

We write jointly on behalf of the Plaintiff in this action and defendants Sean Combs, Daddy's House Recordings Inc., CEOpCo, LLC d/b/a Combs Global f/k/a Combs Enterprises, LLC, Bad Boy Entertainment Holdings, Inc., Bad Boy Productions Holdings, Inc., Bad Boy Books Holdings, Inc., Bad Boy Entertainment LLC, and Bad Boy Productions LLC (the "Combs Defendants") concerning the motion to dismiss filed by the Combs Defendants on March 11, 2025 (the "Motion to Dismiss"). *See* ECF #55.

Under Local Civil Rule 6.1, the default deadline for opposition to the Motion to Dismiss is March 25, 2025, and the default deadline for a reply is April 1, 2025. The undersigned parties respectfully request an extension of these default deadlines to **April 29, 2025** for Plaintiff's opposition and **May 30, 2025** for the Combs Defendants' reply. The parties request this extension to accommodate unusually busy work schedules within this timeframe, attributable in part to multiple other recent lawsuits in this District and the New York state courts involving the same Combs Defendants and counsel for both sides.

No prior request for this relief has been made.

Respectfully submitted,

/s/ Mark Cuccaro

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